

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,¹

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**RESPONSE IN SUPPORT OF THE
ADDITIONAL TORT CLAIMANTS COMMITTEE OF SEXUAL
ABUSE SURVIVORS' MOTION FOR AN ORDER PURSUANT TO
BANKRUPTCY RULE 2004 DIRECTING PRODUCTION OF DOCUMENTS
AND MATERIALS FROM THE UNITED STATES OLYMPIC COMMITTEE**

The individual members (the “Individual Members”) of the Additional Tort Claimants Committee of Sexual Abuse Survivors’ Committee (the “Sexual Abuse Survivors’ Committee”), by and through their individual counsel, hereby file this response in support of *The Additional Tort Claimants Committee of Sexual Abuse Survivors’ Motion for an Order Pursuant to Bankruptcy Rule 2004 Directing Production of Documents and Materials from the United States Olympic Committee* (the “2004 Exam Motion”) [Doc 433], and state as follows:

1. On April 26, 2019, the Sexual Abuse Survivors’ Committee filed the 2004 Exam Motion requesting entry of an order authorizing the Sexual Abuse Survivors’ Committee to issue a subpoena, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, to the United States Olympic Committee (the “USOC”) compelling the production of certain documents and information.

2. The Individual Members and the law firms listed below, who collectively represent a substantial supra-majority of the sexual abuse survivors, support the efforts of the

¹ The last four digits of the Debtor’s federal tax identification number are 7871. The location of the Debtor’s principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

Sexual Abuse Survivors' Committee to obtain the requested document production from the USOC and hereby adopts, joins and incorporates by reference all reasons for such document production as stated in the 2004 Exam Motion by the Sexual Abuse Survivors' Committee.

3. The requested document production from the USOC is critical to meaningful participation in the upcoming mediation by the Individual Members and all other sexual abuse survivors.

WHEREFORE, for the reasons stated herein and in the 2004 Exam Motion, the Individual Members and the law firms listed below respectfully request that the Court grant the 2004 Exam Motion in its entirety, and grant such other and further relief as this Court deems just and proper under the circumstances.

Dated: June 7, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2019, a copy of the foregoing *Response in Support of the Additional Tort Claimants Committee of Sexual Abuse Survivors' Motion for an Order Pursuant to Bankruptcy Rule 2004 Directing Production of Documents and Materials from the United States Olympic Committee* was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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I further certify that on June 7, 2019, a copy of the foregoing *Response in Support of the Additional Tort Claimants Committee of Sexual Abuse Survivors' Motion for an Order Pursuant to Bankruptcy Rule 2004 Directing Production of Documents and Materials from the United States Olympic Committee* was served via electronic mail to the following:

United States Olympic Committee: Chris McCleary at Chris.McCleary@usoc.org
The Alexander, a Dolce Hotel and Wyndham Hotel Group, LLC: Daniel M. Eliades at daniel.eliades@klgates.com and David S. Catuogno at david.catuogno@klgates.com

/s/ Manvir S. Grewal Sr.

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